

A H M A D K E S H A V A R Z

Attorney at Law

16 COURT ST., 26TH FLOOR WWW.NEWYORKCONSUMERATTORNEY.COM
BROOKLYN, NY 11241-1026 E-mail: ahmad@NewYorkConsumerAttorney.com

Telephone: (718) 522-7900
Fax: (877) 496-7809

December 11, 2022

Hon. Judge Eric R. Komitee
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Request for Omnibus Opposition of 50 pages to the Defendants' Two Motions to Dismiss.

Onfroy v. The Law Office of Geoffrey T. Mott, P.C., et al., No. 1:22-cv-02314-EK-LB

Dear Judge Komitee:

This firm, along with Nassau Suffolk Law Services Committee, Inc., represents Plaintiff Lovern Onfroy in the above-entitled action regarding violations of the Fair Debt Collection Practices Act ("FDCPA"), N.Y. General Business Law § 349, and for gross negligence.

Given the complexity of the facts in this action (the allegations pertain to three collection lawsuits against the Plaintiff alone, and 14 other consumers subjected to the same practices are discussed), Plaintiff is having considerable difficulty addressing the respective Motions to Dismiss by the Mott Defendants and by Defendant Kenneth DeCota in the 25 page limit required by Your Honor's Individual Rules. Accordingly, Plaintiff requests leave to file a single omnibus opposition to the Motions to Dismiss consisting of 50 pages. By sharing a single statement of fact, Plaintiff should be able to address all the arguments of the respective Motions in the allotted page limit.

Plaintiff apologizes for filing this application on a Sunday, but it was necessary to comply with Your Honor's requirement of five days' notice for requests to exceed the page limits for briefing. Rules § D(2).

Sincerely,

/s/

Emma Caterine